

1 The Honorable Tana Lin
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 N.S.S.,

10 Plaintiff,

11 v.

12 DANIELLE LEHMAN, *et al.*¹

13 Defendants.

Case No. 2:25-cv-00042-DWC

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND
[PROPOSED] ORDER

Noted for Consideration:
April 1, 2025

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15 Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule
16 of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to
17 hold this case in abeyance until October 8, 2025. Plaintiff brought this litigation pursuant to the
18 Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel the U.S.
19 Citizenship and Immigration Services (“USCIS”) adjudicate her Form I-589, Application for
20 Asylum and for Withholding of Removal. Defendants’ response to the Complaint is currently due
21 on April 7, 2025. The parties are currently working towards a resolution to this litigation. For
22 good cause, the parties request that the Court hold the case in abeyance until October 8, 2025.

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24 ¹ Pursuant to Federal Rule of Civil Procedure 25(d), Defendants substitute Senior Official Performing the Duties of
the Director Kika Scott for Ur M. Jaddou and Secretary Kristi Noem for Alejandro Mayorkas.

1 Courts have “broad discretion” to stay proceedings. Clinton v. Jones, 520 U.S. 681, 706
 2 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to
 3 control the disposition of the causes on its docket with economy of time and effort for itself, for
 4 counsel, and for litigants.” Landis v. N. Am. Co., 299 U.S. 248, 254 (1936); see also Fed. R.
 5 Civ. P. 1.

6 With additional time, this case may be resolved without the need of further judicial
 7 intervention. USCIS has scheduled Plaintiff’s asylum interview for June 10, 2025. USCIS
 8 agrees to diligently work towards completing the adjudication within 120 days of the interview,
 9 absent unforeseen or exceptional circumstances that would require additional time for
 10 adjudication. If the adjudication is not completed within that time, USCIS will provide a status
 11 report to the Court within seven calendar days. Plaintiff will submit all supplemental documents
 12 and evidence, if any, to USCIS seven to ten days prior to the interview date. Plaintiff recognizes
 13 that failure to submit documents prior to the interview may require the interview to be
 14 rescheduled and the adjudication delayed. If needed, Plaintiff will bring an interpreter to the
 15 interview, otherwise the interview will need to be rescheduled and the adjudication delayed.
 16 Once USCIS adjudicates the application, Plaintiff will voluntarily dismiss this litigation.
 17 Accordingly, the parties request this abeyance to allow USCIS to conduct Plaintiff’s asylum
 18 interview and then process her asylum application.

19 As additional time is necessary for this to occur, the parties request that the Court hold
 20 the case in abeyance until October 8, 2025. The parties will submit a joint status report on
 21 or before October 8, 2025.

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STIPULATED MOTION FOR ABEYANCE
 [Case No. 2:25-cv-00042-DWC] - 2

UNITED STATES ATTORNEY
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1 DATED this 1st day of April, 2025.

2 Respectfully submitted,

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15 *Attorneys for Defendants*

16 *I certify that this memorandum contains 395 words,
17 in compliance with the Local Civil Rules*

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Attorney for Plaintiff

1 ~~PROPOSED~~ ORDER

2 The parties having stipulated and agreed, it is hereby so ORDERED. This case shall be
3 held in abeyance until October 8, 2025. The parties shall file a stipulated motion for dismissal or
4 a joint status report on or before October 8, 2025.

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6 DATED this 7th day of April, 2025.

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TANA LIN
United States District Judge

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